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STATE OF NORTH CAROLINA
DEPARTMENT OF TRANSPORTATION

DIVISION OF MOTOR VEHICLES
LICENSE AND THEFT BUREAU

PAT MCCRORY
GOVERNOR

ANTHONY J. TATA
SECRETARY

December 11, 2013

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: North Carolina Division of Motor Vehicles, License and Theft Bureau's Letter of Support for Request for Partial Waiver of Section 90.20(e)(6)(i) by the International Association of Auto Theft Investigators
PS Docket No. 13-281

Dear Ms. Dortch:

The North Carolina Division of Motor Vehicles, License And Theft Bureau strongly supports the request for partial waiver ("Waiver Request") filed by the International Association of Auto Theft Investigators ("IAATI") requesting that the Federal Communications Commission ("FCC") waive Section 90.20(e)(6)(ii) of its rules, thereby allowing public safety entities to track and recover stolen vehicles equipped with SVRS equipment for as long as those vehicles are in use.

The North Carolina Division of Motor Vehicles, License & Theft Bureau is comprised of 200 sworn officers and 63 civilian support personnel strategically placed across this great state, in all 100 counties. We serve and protect more than 7.2 million licensed drivers, identification holders and 8.8 million registered vehicles and their owners from fraud, theft and impositions. We regulate and enforce the laws that govern 7,695 licensed motor vehicle dealers with 40,850 licensed salespersons, 5,862 licensed inspections stations and 37,883 licensed inspection technicians. Our officers serve a crucial role in enforcing state laws and administrative civil penalties. In addition to the enforcement aspects of the agency, we strive to assist our Department of Transportation and Division of Motor Vehicle partners and continue to build new partnerships by demonstrating resolve and commitments throughout the law enforcement community, as

ALL CORRESPONDENCE SUBMITTED TO:
NC DIVISION OF MOTOR VEHICLES
LICENSE AND THEFT BUREAU
2815 EAST TENTH STREET
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LOCATION:
DMV LICENSE & THEFT BUREAU
DISTRICT I OFFICE
2815 EAST TENTH STREET
GREENVILLE NC

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well as the public and private sector by facilitating enhanced and strategic access for those needing the agency's service.

As described in the Waiver Request, IAATI seeks a partial waiver to allow wideband (25 kHz) Vehicle Locator Units to transmit response signals after the FCC's May 27, 2019 narrow banding deadline so that older vehicles equipped with these devices may be tracked and recovered if stolen. We believe that the FCC's grant of IAATI's Waiver Request will benefit greatly the North Carolina Division of Motor Vehicles, License & Theft Bureau and the public.

The North Carolina Division of Motor Vehicles, License & Theft Bureau currently has LoJack locators installed in assigned patrol vehicle and are utilized on a daily basis to continually search for stolen vehicles in and across the state of North Carolina. The use of the LoJack locator in our patrol vehicles have increased our vehicle recovery rate and those recoveries have assisted the agency in locating other criminal activity and allowed the agency to deter crime that would have otherwise gone undiscovered.

We urge the FCC to adopt in full IAATI's Waiver Request.

Respectfully,

A handwritten signature in black ink, appearing to read "Steven M. Watkins", with a stylized flourish at the end.

Steven M. Watkins, Director
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License & Theft Bureau
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Raleigh, NC 27699
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